REMARKS

Formal Matters

Claims 1-18 constitute all currently pending claims in the present Application.

Applicant thanks the Examiner for initialing the information disclosure statement (IDS) submitted on October 20, 2004, and accepting the drawings filed on July 8, 2007.

Objection to Specification

The Examiner objects to the specification as allegedly failing to provide proper antecedent basis for the phrase "physical computer-readable medium."

Applicant hereby amends this phrase to recite "computer-readable medium," and amends the present disclosure to clarify "computer-readable medium" as understood by those of ordinary skill in the art. Applicant respectfully submits that these amendments are amply supported by the original disclosure and the knowledge of those of skill in the art at the time of invention, and therefore introduce no impermissible new matter. Accordingly, Applicant respectfully requests that the Examiner withdraw this objection.

The Examiner also objects to the phrase "the number and type of parameter . . . are modifiable without modifying the structure of said first table." Applicant hereby amends the claims to remove this language, rendering this objection moot. Accordingly, Applicant respectfully requests that the Examiner withdraw this objection.

Claim Rejections Under 35 U.S.C. § 112

Claims 1-18 stand rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. Additionally, claims 1-18 stand rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. Applicant traverses these rejections for at least the following reasons.

The Examiner contends that the phrase "the number and type of parameter . . . are modifiable without modifying the structure of said first table" was not sufficiently described in the original disclosure, and is indefinite. Applicant hereby amends the claims to remove this language, rendering these rejections moot. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejections under the first and second paragraphs of 35 U.S.C. § 112.

Claim Rejections Under 35 U.S.C. § 101

Claims 1-8 stand rejected under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter. Applicant traverses this rejection for at least the following reasons.

The Examiner contends that Applicant has not provided explicit and deliberate definition for the phrase "physical computer-readable medium." Applicant hereby amends this phrase to "computer-readable medium" and amends the specification to further clarify this term as understood by those of skill in the art at the time of invention. Accordingly, Applicant respectfully requests that the Examiner withdraw this rejection.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-18 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,170,012 to Coss et al. ("Coss"). Applicant traverses this rejection for at least the following reasons.

Independent claim 1 is amended to require that "said at least one primary metarule is specified according to a string of characters containing a place-holder for each parameter of said primary metarule that is not statically defined." This amendment is amply supported by the specification and adds no impermissible new matter. For example, page 15 of the specification

describes a non-limiting exemplary embodiment including parameters having place-holders, such as "Source=$1" and "Destination=$1." (Specification at p. 15, line 25 – p. 16, line 2.) This portion of the specification further explains the other parameters in this exemplary embodiment as being "defined statically," stating that "[t]he other parameters ('Protocol[=]tcp, DestinationPort=smtp' or 'FromLanToWan') characterizing the primary rules are defined statically in the first table entry." (Specification at p. 16, lines 5-8.) Coss fails to disclose the features of amended claim 1.

Although Coss does appear to teach a table of values in Fig. 3, Coss fails to show that a row of this table may be "specified according to a string of characters," since each row of the table in Fig. 3 of Coss appears to contain a number of separate values inserted in a table, one such value in each column, each column being designated for a separate value or parameter. Furthermore, Coss fails to show that such a "string of characters" may contain "a place-holder for each parameter of said primary metarule." Even if the Examiner were to construe the asterisk shown in Fig. 3 of Coss as a "place-holder," Coss fails to teach any "string of characters" that contains a place-holder "for each parameter" of the row.

Thus, Coss fails to identically disclose each and every element of independent claim 1. Coss, therefore, fails to anticipate claim 1. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claim 1 and its dependent claims 2-8.

Moreover, independent claims 9, 15, 17, and 18 are amended to recite features similar to those of independent claim 1. These claims are, therefore, also patentable at least for reasons analogous to those presented above with respect to claim 1. Accordingly, Applicant respectfully

requests that the Examiner withdraw the rejection of independent claims 9, 15, 17, and 18, and their

dependent claims 10-14 and 16.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

This Application is being filed via the USPTO Electronic Filing System (EFS).

Applicant herewith petitions the Director of the USPTO to extend the time for reply to the

above-identified Office Action for an appropriate length of time if necessary. Any fee due under

37 U.S.C. § 1.17(a) is being paid via the USPTO Electronic Filing System (EFS). The USPTO is

also directed and authorized to charge all required fees, except for the Issue Fee and the

Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said

Deposit Account.

Respectfully submitted,

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